

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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IN RE SONUS NETWORKS, INC. ) Civil Action No. 04-10294-DPW  
SECURITIES LITIGATION ) (Lead Case)  
\_\_\_\_\_  
 )  
THIS DOCUMENT RELATES TO: )  
ALL CASES )  
\_\_\_\_\_ )

**LEAD PLAINTIFF'S NOTICE OF MOTION AND  
MOTION TO COMPEL PRODUCTION OF DOCUMENTS  
[Supporting documents filed under seal]**

Pursuant to Rules 26, 34, 37(a), and 45 of the Federal Rules of Civil Procedure, Lead Plaintiff BPI Global Asset Management LLP hereby moves the Court for an Order compelling Defendant Sonus Networks, Inc. to produce (and to permit non-parties Ernst & Young LLP (“E&Y”), PricewaterhouseCoopers LLP (“PwC”), and Huron Consulting Group (“Huron”) to produce) improperly withheld and/or redacted documents.

This motion is made on the ground that Sonus is improperly withholding (and instructing E&Y, PwC, and Huron to withhold) documents that Lead Plaintiff is entitled to receive in this litigation, based on improper claims of attorney-client privilege and/or work product protection. This motion is based on this notice of motion and motion, the accompanying memorandum of points and authorities (filed under seal), the accompanying Affidavit of Pamela A. Markert (filed under seal), the complete files in this matter; and such oral argument permitted by the Court.

WHEREFORE, for the foregoing reasons, and those stated in the memorandum of law, Lead Plaintiff respectfully requests that the Court enter an Order directing Sonus to produce (and to allow E&Y, PwC, and Huron to produce) all documents improperly withheld pursuant to claims of attorney-client privilege and/or work product protection.

**REQUEST FOR ORAL ARGUMENT**

Lead Plaintiff believes that oral argument may assist the Court in reaching a decision on the issues in this motion and wishes to be heard. Accordingly, Lead Plaintiff requests a hearing pursuant to Local Rule 7.1(d).

Respectfully Submitted,

Dated: October 16, 2007

GOLD BENNETT CERA & SIDENER LLP

By \_\_\_\_\_/s/Solomon B. Cera

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**LEAD PLAINTIFF'S LOCAL RULES 7.1(A) AND 37.1(B) CERTIFICATION**

Pursuant to Local Rules 7.1(A)(2) and 37.1(B), counsel for Lead Plaintiff hereby certifies that they have conferred in good faith with counsel for defendant Sonus Networks, Inc. ("Sonus"), regarding the privilege and redactions logs for Sonus's SEC production, and the privilege and redaction logs for third parties Ernst & Young LLP, Huron Consulting Group, and PricewaterhouseCoopers LLP, and was unable to resolve the matters at issue on this motion. This was done through teleconferences with Sonus's counsel during the weeks of June 19 and June 26, 2006; on August 7, 16, 18, 2006; on September 7, 2006; on December 20, 2006, and written letters between the parties dated October 10, 2006 and October 23, 2006. Over the past year, the parties have engaged in continuous discussions, by telephone, letter, and email, concerning the subject matter of this motion.

Respectfully submitted,

Dated: October 16, 2007

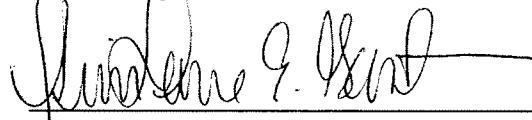
By: /s/ Pamela A. Markert

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CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby certify that on October 16, 2007, I electronically filed the foregoing documents: **“LEAD PLAINTIFF’S NOTICE OF MOTION AND MOTION TO COMPEL PRODUCTION OF DOCUMENTS; LEAD PLAINTIFF’S LOCAL RULES 7.1(A) AND 37.1(B) CERTIFICATION”** with the Clerk of the Court using the CM/ECF System which sent notification of such filing to all counsel of record.



KimLane E. Gantan